

April 17, 2013

Via Electronic Filing

Marlene H. Dortch, Secretary
Federal Communications Commission
225 12th Street, S.W.
Washington, DC 20554

Re: *Ex Parte* Presentation, GN Docket No. 11-117; WC Docket No. 05-196; and PS Docket Nos. 10-255 & 11-153

Dear Ms. Dortch:

On April 15, 2013, Maurice Tosé, President, CEO, and Chairman of the Board of TeleCommunication Systems, Inc. (“TCS”) and Kim Scovill, Senior Director - Legal and Government Affairs, TCS, H. Russell Frisby, counsel to TCS, Chris Guttman-McCabe, Vice President, Regulatory Affairs, CTIA–The Wireless Association® (“CTIA”), and Brian Josef, Assistant Vice President, Regulatory Affairs, CTIA, met with Commissioner Ajit Pai and Courtney Reinhard, Legal Advisor, of the Federal Communications Commission (“Commission” or “FCC”) to discuss the Petition of TCS for Declaratory Ruling and/or Rulemaking.

During the meeting, TCS and CTIA representatives explained that, with respect to 28 U.S.C. § 1498, the FCC should provide guidance in the narrow context of 9-1-1 that: (a) based on 47 C.F.R. §§ 9.7 and 20.18 and Commission precedent, the provision of enhanced 911 (“E-911”) and next generation 911 (“NG-911”) location-based services is in furtherance and fulfillment of a stated Government policy; (b) the Commission is now aware that its stated policy may require application of a patent if an E-911 services provider is to comply with FCC regulations; and (c) E-911 and NG-911 location-based services are used with the authorization or consent of the Government.

TCS and CTIA representatives further stressed that Commission guidance will help ensure that the numerous lawsuits by patent assertion entities (“PAEs”) do not threaten the provision of emergency communications services, particularly at this critical time when the wireless industry and public safety community are working closely to develop and deploy text-to-911 and NG-911 solutions.

Pursuant to Section 1.1206 of the Commission’s rules, 47 C.F.R. § 1.1206, this letter and a copy of materials presented during the meeting is being electronically filed

via ECFS with your office and a copy of this submission is being provided to the meeting attendees. Please direct any questions to the undersigned.

Sincerely,

/s/ Brian M. Josef

Brian M. Josef
Assistant Vice President – Regulatory Affairs
CTIA-The Wireless Association®

Attachment

cc: Commissioner Ajit Pai
Courtney Reinhard